



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

April 22, 2013

Townsend EIS Project Manager
P.O. Box 180458
Tallahassee, Florida 32318

Subject: FEIS for Proposed Modernization and Expansion of Townsend Bombing Range, Georgia.

Pursuant to Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the U. S. Marine Corps Final Environmental Impact Statement (FEIS) for the Proposed Modernization and Expansion of Townsend Bombing Range, Georgia. Under Section 309 of the CAA, EPA is responsible for reviewing and commenting on major federal actions significantly affecting the quality of the human environment.

Background:

MCAS Beaufort, South Carolina, is home to Marine Aircraft Group (MAG)-31, which has six operational F/A-18 Hornet Squadrons. The F/A-18 is a fighter and attack jet aircraft that carries out air-to-air and air-to-ground missions from land bases and aircraft carriers. MAG-31 conducts anti-air-warfare and offensive air support operations in support of Fleet Marine Forces from advanced bases, expeditionary airfields, or aircraft carriers and conducts other air operations as directed.

Through the preparation of a Universal Need Statement (UNS; May 1, 2003), MAG-31 identified its requirement for an air-to-ground training range that allows aircrews to utilize PGMs in a realistic training environment. Following the preparation of the UNS, the USMC began the process to certify the requirement to establish an air-to-ground training range to support MAG-31's aviation training needs and develop the approach to accommodate this requirement. In 2009, the Marine Requirements Oversight Council (MROC) concurred with the concept to expand TBR. Thus, the MROC approved the requirement to establish an East Coast range capable of supporting PGM training and determined that modernization of TBR was critical to ensuring the effective training of East Coast-based USMC aviation units. The MROC's concurrence with MAG-31's need for an air-to-ground range that can accommodate realistic PGM training allowed the USMC and the DON to request the Department of Defense's (DOD's) approval to study the land acquisition alternatives that could support the creation of a modernized air-to-ground training range. The Office of the Secretary of Defense approved the request in December 2009. Based on these developments, the USMC initiated the preparation of the EIS to examine the potential impacts of the proposed land acquisition and airspace modification alternatives that could meet the training requirement.

To fulfill MAG-31's aviation training requirement to train with Precision Guided Missiles (PGM)s in a realistic training environment and achieve readiness proficiency for air-to-ground operations for MAG-31 F/A-18 pilots, the USMC proposes to modernize and expand TBR. This modernization and expansion of TBR would provide an enhanced, air-to-ground training range for MAG-31 F/A-18s that would safely accommodate the use of inert PGMs as well as the suite of inert weapons that are currently used at TBR and thus achieve greater readiness proficiency for air-to-ground operations. Inert weapons contain no explosives, but may contain a small smoke charge (spotting charge) to assist in scoring the event and providing feedback to the pilot.

It is critical that TBR, as the primary air-to-ground range for MAG-31, has the capability to accommodate MAG-31's operational requirements, including training in the employment of PGMs, and the adaptability to accommodate evolving training needs and areas of emphasis. TBR is one of four air-to-ground ranges within the USMC's inventory on the East Coast and one of seven USMC ranges in the United States that support air combat/air-to-ground operations. TBR is centrally located between the Gulf Coast and the Eastern Seaboard and because of its strategic location is an ideal venue in support of military training requirements.

Munitions that are currently utilized for training at TBR are non-guided, inert weapons. Under TBR's present configuration, it is unable to meet all the requirements of the current F/A-18 air-to-ground training syllabus, including the delivery of PGMs; furthermore, no range within the local flying area is capable of supporting MAG-31's required level of PGM training.

Alternatives:

EPA understands that this FEIS examined four action alternatives and the No Action Alternative. All four action alternatives would involve the acquisition and management of land and a timber easement, the modification of existing airspace, and the infrastructure to support PGM training, and would result in the improvement of training. During this process, the USMC developed four possible land acquisition areas. Acquisition Area 2, which was presented during the public scoping period, is not being carried forward for further analysis. Also, during preparation of this EIS, Area 1, as it was presented during the public scoping period, was divided into two sections and renamed Areas 1A and 1B. Therefore, the three possible land acquisition areas for the Proposed Action are:

- Alternative 1: Acquisition Area 1A and Area 1B
- Alternative 2: Acquisition Area 3
- Alternative 3: Acquisition Area 1A, Area 1B, and Area 3
- Alternative 4: Acquisition Area 1B and Area 3

Based on the analysis presented in the FEIS, the USMC has selected Alternative 4 as the Preferred Alternative. Alternative 4 represents the most favorable balance of operational utility and acceptable environmental impacts. Both operational and environmental criteria were compared in order to identify Alternative 4 as the Preferred Alternative.

The Proposed Action includes acquisition of up to approximately 29,000 acres within two areas (e.g., Acquisition Areas 1 and 3. A third Acquisition Area, Area 2, was originally considered as part of the Proposed Action, but was subsequently dropped from consideration due to environmental sensitivity in Long and McIntosh Counties, Georgia, for the modernization and expansion of TBR. As part of the Proposed Action, up to eight Impact Areas, (IAs) would be placed within the two Acquisition Areas according to the FEIS, Attachment B, Figure 1-1. Within the eight IAs, target infrastructure and new roads would be constructed, and upgrades to existing roads would occur. Areas outside the IAs would serve as safety buffers.

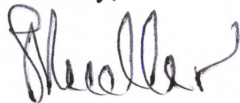
EPA's Comments:

EPA's initial comments concerning noise and potential impacts to wetlands were adequately addressed in the Final Environmental Impact Statement. EPA recommends the U. S. Marine Corps continue to seek ways to reduce, avoid and mitigate the impacts to wetlands in future use of this proposed action. Please continue to work with the Corps of Engineers and EPA's Region 4 permitting staff.

In summary, EPA has no major environmental concerns regarding this project as stated above, and rates this Final EIS as "Lack of Objections (LO)" i.e. (The review has not identified any potential impacts requiring substantive changes to the preferred alternative).

Thank you for the opportunity to review and provided comments. If you wish to discuss this matter further, please contact Larry O. Gissentanna (404-562-8248 or Gissentanna.larry@epa.gov) of my staff.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mueller", with a stylized, cursive script.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Environmental Accountability

Enclosures: Summary of Rating Definitions

U.S. ENVIRONMENTAL PROTECTION AGENCY ENVIRONMENTAL IMPACT STATEMENT (EIS) RATING SYSTEM CRITERIA

EPA has developed a set of criteria for rating Draft EISs. The rating system provides a basis upon which EPA makes recommendations to the lead agency for improving the draft.

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

- **LO (Lack of Objections):** The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.
- **EC (Environmental Concerns):** The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.
- **EO (Environmental Objections):** The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental objections can include situations:
 1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
 2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
 3. Where there is a violation of an EPA policy declaration;
 4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
 5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.
- **EU (Environmentally Unsatisfactory):** The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:
 1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
 2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
 3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

- **1 (Adequate):** The Draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.
- **2 (Insufficient Information):** The Draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the Draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the Final EIS.
- **3 (Inadequate):** The Draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the Draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the Draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised Draft EIS.